



## Information and Records Policy

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<b>Police</b>	Call <b>999</b> in an emergency, e.g., when a crime is in progress, when there is danger to life or when violence is being used or threatened. For less urgent issues call local police on <b>101</b> .
<b>Ofsted</b>	0300 123 1231 <a href="#">Contact Us   Ofsted Parent View</a>
<b>Worcestershire Children First</b>	<b>Early Years and Childcare</b> 01905 844048 <a href="mailto:EYCC@worcschildrenfirst.org.uk">EYCC@worcschildrenfirst.org.uk</a> <a href="#">Contact us Information - Worcestershire Children First Education Services</a>
<b>Community Social Workers</b>	<a href="#">How to contact Children's Social Care  </a> <a href="#">How to contact Children's Social Care  </a> <a href="#">Worcestershire County Council</a>
<b>Local Authority Designated Officer</b>	01905 846221 (or via the FFD)
<b>Date of last review</b>	<b>January 2021</b>
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<b>Pinvin Community Preschool current Policies and Procedures:</b> Safeguarding and Child Protection; Health and Hygiene; Safety and Suitability of Premises; Environment and Equipment; Suitable People; Information and Records (including GDPR); Self-regulation in the Early Years; Equality and Diversity; SEND in the Early Years; The Role of the Early Years Educator; Covid-19 Response.	

<b>CONTENT</b>	
General Data Protection Regulations 2020 to 2021 Privacy Notice	Pages 3 to 9
General Data Protection Regulations 2020 to 2021 Compliance	Pages 10 to 23
Admissions Policy (including Nursery Education Funding)	Pages 24 to 39
Parental Involvement	Pages 40 to 41
Children's Records	Pages 42 to 43
Provider Records	Pages 44 to 45
Transfer of Records to School and other settings	Pages 46 to 48
Confidentiality	Pages 49 to 50
Working in Partnership with other agencies	Pages 51
Making a Complaint	Pages 52 to 54
Reviewing and Implementing Policy	Pages 55 to 56
<b>APPENDICES:</b>	
GDPR Glossary	Pages 57 to 59
Data processing risk assessments	Pages 60 to 67
2020 – 2021 Term Dates	Page 68

## General Data Protection Regulations 2020-2021 Privacy Notice

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### **General Data Protection Regulations Privacy Notice**

GDPR stands for the General Data Protection Regulation and replaces the previous Data Protection Act, 1998. At its most basic level GDPR is designed to give people more control over their personal data by ensuring it is only ever collected, stored and utilised with specific consent. It was approved by the EU parliament in 2016 and comes into effect on the 25<sup>th</sup> May 2018.

### **Our Aim**

We are committed to meeting the GDPR requirements and have created and published this privacy notice to communicate to all our users our procedures to meet these statutory duties.

### **General Data Protection Privacy Notice**

Pinvin Community Pre-school is the data controller of the personal information you provide to us, personal information is defined as information that identifies a person as an individual. As part of our commitment to protect the rights and freedoms of individuals in the processing of data we have a designated person representing Pinvin Community Pre-school, with regard to our data controller responsibilities. Additionally, we are registered with the Information Commissioners Office (ICO) under registration number A8280583.

### **GDPR Principles**

Personal data should be;

1. Processed lawfully, fairly and in a transparent manner
2. Collected for specified, explicit and legitimate purposes
3. Adequate, relevant and limited to what is necessary
4. Accurate and where necessary kept up to date
5. Retained only for as long as necessary
6. Processed in an appropriate manner to maintain security

**Why do we collect your data?**

Our primary reasons for processing data are to meet our legal obligations in regard to operating as an Early year's childcare provider, and our legal duties as an employer. Whilst the majority of the data you provide is mandatory some is provided on a voluntary basis. For voluntary data we will provide you with specific and explicit information with regards to the reasons the data is being collected and how the data will be used.

**What data is collected?**

We process personal data about prospective, current and past; pupils, families, staff members, students, suppliers, professional agencies and other individuals connected to Pinvin Community Pre-school. The personal data we process takes different forms, it may be factual information, expressions of opinion, images or other recorded information which identifies or relates to a living individual;

- Names, addresses, telephone numbers, email addresses and other contact details
- Family details
- Relevant medical information
- Information about special educational needs and disabilities
- Assessment information including behavioural information
- Education and employment data
- Images, audio and video recordings
- Financial information
- Continuous professional development i.e. Courses meetings or events attended
- Staff administration to include recruitment, performance, conduct of any grievance, capability or disciplinary procedures and the maintenance of appropriate human resources records for current and former staff; and providing references.

As an employer and Early years provider we sometimes need to process special category personal data e.g. health information and criminal records information

about some individuals. We do so in accordance with applicable law (including with respect to safeguarding or employment) or by explicit consent.

### **How do we collect data?**

We collect most of the personal data we process directly from the individual concerned (or in the case of children, from their parents). In some cases, we collect data from third parties (for example, referees, previous schools, the disclosure and barring service, or professionals or authorities working with the individual).

### **Lawful basis for processing data**

GDPR states personal data can only be processed if one or more of the following apply;

Processing is necessary for;

1. the performance of a contract with the data subject
2. compliance with a legal obligation
3. to protect the vital interests of the data subject
4. the public interest or the controller has official authority
5. the purposes of legitimate interests pursued by the controller or a third party
6. Or the data subject has provided consent

#### **1: Necessary for a contract**

This constitutes processing of information in order to perform our obligations under our contract with you. Examples of this could be; we require contact details, so we can contact you with any concerns or we need your national insurance number to be able to pay you or claim for funding on your behalf.

#### **2: Legal obligation**

This concerns the processing of information in order to comply with a legal obligation, for example the reporting of a safeguarding concern. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

#### **3: Vital interests**

This would constitute the processing of information to prevent someone from being seriously harmed or killed. Examples would be medical information required to keep the data subject from harm.

#### **4: Public interest**

Data processed in the 'public's interest' may be information given in censuses, government initiatives or reporting incidents to police. This list is not exhaustive.

#### **5: Legitimate interests**

Pinvin community pre-school has a legitimate interest to;

The child and family;

- Providing educational services to your child
- Safeguarding and promoting the welfare of your child and other children

Staff members;

- Ensuring all legal obligations as an employer are met
- Safeguarding and promoting the welfare of employees

The setting;

- Promoting the interests of the pre-school
- Facilitating the efficient operation of the pre-school
- Forward planning to ensure the longevity of the business to include marketing and fundraising opportunities

#### **Will my information be shared?**

Pinvin community pre-school will share personal data (including special category personal data where appropriate) with third parties such as;

- ✓ Worcestershire Safeguarding Board
- ✓ HM revenue and customs
- ✓ Local authority i.e. claiming for NEF funding
- ✓ Department for work and pensions
- ✓ Insurance company
- ✓ Ofsted i.e. if your child has a serious injury in our care
- ✓ Public Health England i.e. reportable diseases
- ✓ Paramedics/health professionals in the case of an emergency
- ✓ Legal representatives regarding employment law or breach of contracts

- ✓ Schools or settings where the child has split placement
- ✓ Police
- ✓ Professional agencies when supporting children and families

Some of our systems are provided by third parties, e.g. Tapestry, pre-school website, providers portal, NEST pension scheme or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with our specific directions.

School Transition – When a child moves on to school or changes setting, we are committed to supporting a seamless transition. With this in mind we will share information relating to your child's development, and interests and any other information we feel is appropriate during the transition process.

### **How is my data stored?**

Pinvin Community Pre-school takes its responsibilities as data controller seriously and review risk assessments regularly on how we store data to prevent a data breach. All paper copies of children and staff records are kept in a locked filing cabinet. Members of staff can have access to these files in order to perform their duties, however information taken from files about individual children is confidential.

### **How long is your data stored for?**

We retain personal data only for a legitimate and lawful reason and only for so long as necessary or required by law. We have adopted the Early Years Learning Alliance guidelines which set out the time period for which different categories of data are kept. Once a child or staff member has left the Pre-school, we archive paper documents using suitable data storage hardware or keep original documents where necessary. All paper documents are shredded or deleted after the retention period. If you have any specific queries about our record retention periods or wish to request that your personal data is considered for erasure, please contact our representative, Bobby Pearson.

### **What are your rights?**

You have various rights under the GDPR in regard to accessing and understanding the personal data we hold about you, and in some cases to ask for it to be erased or amended subject to certain exemptions and limitations.

**The Right to be Informed**

As a data subject you have a right to be informed of what data we process, this information is detailed within this privacy notice.

**The Right to Access**

At any time, an individual can make a subject access request (SAR) relating to their data, through contacting Bobby Pearson. We will respond to any request as soon as is reasonably practicable and in any event within statutory time limits, which is currently one month. We will be able to respond quickly to smaller targeted requests for information. If the request is manifestly excessive or similar to previous requests, we may ask you to reconsider or charge a proportionate fee, but only where we are legally entitled to do this. You should be aware that certain data is exempt from right of access. This may include information which identifies other individuals, or information which is subject to legal privilege.

**Right to Rectification**

If any personal data, we hold is incorrect you may ask us to correct it. As part of our normal procedures and contractual obligations we want to ensure that all personal data is as up to date and accurate as possible. Please notify Bobby Pearson of any significant changes to important information, such as contact details held about you. As part of our normal procedures an annual reminder will also be sent out to confirm any changes to the personal data that we hold on you.

**Right to Erasure**

You have the right to request the deletion of your data where there is no legal obligation for us to hold the data

**Right to Restriction of Processing**

In some circumstance's individuals have the right to request the restriction or suppression of their personal data. This means we can hold personal data but are not able to use this.

**Right to Objection**

Data subjects can object to their data being used for certain activities like marketing or research.

**Right to data portability**

Sometimes data subjects require data to be transferred to other organisations, from one IT system to another; for example, Tapestry online learning journals.

**Right to lodge a complaint with the ICO**

If you have a concern about the way in which Pinvin Community Pre-school is collecting or processing your personal data, you can raise a concern with the Information Commissioners Office (ICO) contactable on 0303 123 1113, Monday to Friday 9-5pm.

**What happens if you don't provide information?**

Most personal data is required for us to fulfil our contractual obligations with you, we therefore have the right to withdraw our contract should essential data be withdrawn.

**Declaration**

All our users including employees and families will be asked to give written consent to confirm their understanding of;

- What personal data Pinvin Community Pre-school collects, and reasons for this.
- How we collect data, where this is stored and for how long.
- The lawful basis for data processing.
- Your rights as a data subject.
- How I can complain about how my personal data is processed.

Parents and staff are requested to sign this privacy notice on an annual basis.

## General Data Protection Regulations 2020/21 Compliance

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Personal data is information that relates to an identified or identifiable individual. What identifies an individual could be as simple as a name or a number or could include other identifiers such as an IP address or a cookie identifier, or other factors.

'Processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### **Our Aim**

As an Early year's provider, we hold personal data to fulfil our duties. Our duties in the processing of data are;

- (a) to ensure it is secure
- (b) reduce the amount of data, we store
- (c) collecting only as much data as necessary to complete our processing activities
- (d) keeping data for only as long as it meets its purpose.

This policy outlines our procedures and demonstrates how we prove our compliance to GDPR legislation.

To support us in meeting our duties we have a Data Manager

Bobby Pearson.

### **Awareness of GDPR**

The data manager has a duty to inform decision makers and key people about the implications of GDPR. The data manager keeps themselves informed through regular ICO updates and training; this information is then passed on to the relevant persons. We take our responsibilities seriously and GDPR is now placed on the

agenda for our weekly management meetings. This encourages dialogue and a professional level of challenge to how and why we keep data.

All employees and users of our service have been issued with a privacy notice which clearly states our responsibilities regarding personal data.

### **Data Inventory and Audits**

We hold an Inventory of Data Collection which is reviewed regularly by the Data Manager. This inventory identifies;

- who we hold data for?
- data identifiers collected
- the reasons why this is processed
- the legal basis for processing
- where the data comes from
- when it was collected
- when it is updated
- how long we keep the data for
- where it is stored and;
- who has access to the data?

### **Risk Assessments**

We complete and review regularly risk assessments associated with the collecting, processing, storing, sharing and deletion of data. These include;

- working from a shared premises
- transportation and safety of laptops/phones
- multi agency working and the sharing of information
- use of on-line software - Tapestry
- use of on-line software for HR purposes – People HR
- using third parties i.e. banks for payroll, local authority for funding etc.
- trips and outings
- displays within the setting
- backing up of data

This list is not exhaustive and will be reviewed regularly so we are able to mitigate risk.

## **Consent**

Consent must be freely given, specific, informed and unambiguous. We ensure we seek specific consents through ensuring all of our consent forms are specific with clear statements of what the consent is for. Consent forms are kept on the child's or employees file with the actual statement of what they are signing for.

As part of the terms of condition for employment and child places at the setting, we request parents and employees to update changes at their earliest convenience. We also complete an annual review of data, in September, liaising with parents and employees to ensure all information is relevant and up to date. To help with this process we print registration forms and consents in different colours to represent the year in which they were signed.

If a user wishes to withdraw their consent they may do so verbally. If the withdrawal of the consent may impact our abilities to fulfil our contractual duties, the data subject would need to put their request in writing to the management committee, who would decide the best outcome. We do reserve the right to withdraw our contract should essential data be withdrawn.

## **Subject Access Requests**

Individuals have a right to access their personal data, this is commonly referred to as a subject access. We follow the following procedures in response to a subject access request.

- (a) Individuals can make a subject access request verbally or in writing
- (b) All employees are aware they must pass this request onto the management team at their earliest convenience.
- (c) On receipt either verbally or in written form we would ensure the SAR is valid, we would write to the data subject clarifying the information requested and request sufficient information to verify the data subject's identity. If further verification is needed, we may verify identity by phone and ask specific questions based on the information we hold on them or by

writing requesting a form of identity such as a photocopy of their passport or drivers' licence.

- (d) We would then calculate the target date, one month from receipt of a valid request.
- (e) A search for the data will then commence which may require searching files, emails or personal computer drives.
- (f) The data collected will then be screened to establish if it should be disclosed, this is done on a case by case basis.
- (g) We would then blank out exempt and/or irrelevant information. Paper records will be photocopied and blanked out by a permanent marker; this copy will go to the data subject. For electronic documents the black highlighter tool would be used and the blanked-out copy saved and sent to the data subject.
- (h) A check would then be made that the record is actually about the person concerned and not someone else with the same name. We will only print out the documents or emails which are about the person making the subject access request.
- (i) When printing out emails where there are email exchanges with colleagues, we will only print out the last email in the exchange if previous correspondence is included within it.
- (j) If a record was created by a member of staff acting in a private rather than official capacity, only exceptional circumstances would justify its disclosure, consent would be sought by the person making the record.
- (k) Where a document contains personal data about a number of individuals including the data subject, we will not disclose this information about the third parties. If the record is primarily about the data subject, with incidental information about others, we would blank out the third-party information. If the record is primarily about third-parties we would withhold it unless specific consent was sought.
- (l) We will not disclose records which contain legal advice.
- (m) We will not disclose information which is being used, or may be used in the future, in negotiations with the data subject, if the information gives away our negotiating position and disclosing the information would weaken our negotiating position.

- (n) The exemptions above are not exhaustive, we would seek advice from the ICO if we are concerned about disclosing any material.
- (o) We recognise that the refusal to disclose information that may embarrass us is a criminal offence and these documents must be disclosed. This situation needs to be learned from and addressed by the manager.
- (p) A record of the SAR must be kept on file, this should include all correspondence between ourselves and the data subject and between us and any other parties. A record of decisions should be kept with reasons why we made certain decisions. Plus, copies of the information sent to the data subject. All files should be kept for one year and then securely destroyed.

## **Transparency**

In our commitment to have more transparency with the data we hold on our employees we have invested in an electronic human resources system named People HR. This allows all our employees to have access to all their records we hold on them including their contracts, supervisions, minutes of meetings, and any disciplinary action.

Similarly, with children's developmental records we operate an on-line learning journal which records child observations and assessments. Parents have access to this so all information has transparency.

## **Data Sharing Checklist**

Before sharing data, we would consider the following;

*Is the sharing justified?*

- What is the sharing meant to achieve?
- Have we assessed the potential risks and benefits to individuals and /or society of sharing or not sharing?
- Is the sharing proportionate to the issue you are addressing?
- Could the objective be achieved without sharing personal data?

### *Do we have the power to share?*

- What is the nature of the information i.e. was it given in confidence?
- Do we have a legal obligation to share information i.e. a statutory requirement or a court order?

### *Deciding to share*

If we do decide to share information a record of a decision will be made and put in the GDPR file. This will state the following;

- What information needs to be shared
- The organisations/people involved
- Measures in place to ensure security of data
- How you will communicate the data sharing
- Agreed common retention periods for the data
- Processes to ensure secure deletion is in place
- What arrangements need to be in place to ensure individuals have access to their information should they request it.

It is common practice for us to share information of children in our care to the receiving setting/school. This can be in the form of written data such as developmental data, safeguarding records, end of year reports, and SEND information. We also share data verbally when meeting with the receiving setting/school staff, this is done with the best interests of the child and to support their transition into school, such information may be a general chat about the individual child, their likes/dislikes and sharing of our insider knowledge on how to best integrate the child into the new setting.

### **Information sharing without consent**

We are obliged to share confidential information without consent from the person who provided it or to whom it relates if this will prevent harm to a child or if not sharing the information could be worse than the outcome of having shared it.

In our Child protection policies, we detail those circumstances which would lead us to share information about a child with other services.

The three critical criteria informing the decision are:

- Evidence that the child is suffering, or is at risk of suffering, significant harm.
- Reasonable cause to believe that a child may be suffering, or at risk of suffering, significant harm.
- To prevent significant harm arising to children.

A decision to share information without consent is never taken lightly, is a decision made jointly between staff and committee and always puts the safety and well-being of children first. Careful record keeping of any concerns helps to support any decision for sharing information without consent. Details of our record keeping procedures are also contained in the Safeguarding and Child Protection Policy.

### **Data Breaches**

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

*Example;* Personal data breaches can include: access by an unauthorised third party; deliberate or accidental action (or inaction) by a controller or processor; sending personal data to an incorrect recipient, computing devices containing personal data being lost or stolen; alteration of personal data without permission; and loss of availability of personal data.

### **Reporting a Data Breach**

If you know or suspect a personal data breach has occurred or may occur you should;

1. Contact your Data manager (Bobby Pearson), to report the suspected data breach. A written statement will be required stating factual information about the breach. At this stage confidentiality must be adhered to and the person reporting the suspected data breach must not notify any affected individuals or regulators or investigate further.

2. The management team will acknowledge receipt of the data breach and will collectively take immediate steps to investigate the suspected data breach.
3. Steps will be taken to where possible,
  - contain the data breach
  - recover, rectify or delete the data that has been lost, damaged or disclosed.
  - log the data breach in the pre-schools breach register
  - notify the ICO
  - notify data subjects affected by the breach
  - notify other appropriate parties affected by the breach
  - take steps to prevent further breaches

Please note, if you have reported a data breach to the management team and/or the data manager and you believe these procedures have not been followed please refer to the whistleblowing policy.

### **Reporting to the ICO**

The data manager will notify the ICO when a personal data breach has occurred which is likely to result in a risk to the rights and freedoms of individuals. This will be done without undue delay and, where possible, within 72 hours of becoming aware of the breach. If the pre-school is unsure of whether to report a breach, the assumption will be to report it. Where the notification is not made within 72 hours of becoming aware of the breach, written reasons will be recorded as to why there was a delay in referring the matter to the ICO.

### **Notifying Data Subjects**

Where the data breach is likely to result in a high risk to the rights and freedoms of data subjects, The data manager and/or management team will notify the affected individuals without undue delay including the name and contact details of the data protection manager and ICO, the likely consequences of the data breach and the measures the Pre-School have (or intended) to take to address the breach. When determining whether it is necessary to notify individuals directly of the breach, the management team will co-operate with and seek guidance from the data manager, the ICO and any other relevant authorities (such as the police). If it would involve disproportionate effort to notify the data subjects directly (for example, by not having

contact details of the affected individual) then the Pre-School will consider alternative means to make those affected aware (for example by making a statement on the Pre-School website).

### **Notifying Other Authorities**

The Pre-School will need to consider whether other parties need to be notified of the breach. For example;

- Insurers
- Parents
- Third parties (for example when they are also affected by the breach)
- Local authority
- The police (for example if the breach involved theft of equipment or data).

This list is non-exhaustive

### **Assessing the Breach**

Once initial reporting procedures have been carried out, the Pre-School will carry out all necessary investigations into the breach. The Pre-School will identify how the breach occurred and take immediate steps to stop or minimise further loss, destruction or unauthorised disclosure of personal data. We will identify ways to recover correct or delete data (for example notifying our insurers or the police if the breach involves stolen hardware or data). Having dealt with containing the breach, the School will consider the risks associated with the breach. These factors will help determine whether further steps need to be taken (for example notifying the ICO and/or data subjects as set out above). These factors include;

- What type of data is involved and how sensitive it is?
- The volume of data affected
- Who is affected by the breach (i.e. the categories and number of people involved)?
- The likely consequences of the breach on affected data subjects following containment and whether further issues are likely to materialise
- Are there any protections in place to secure the data (for example, encryption, password protection, pseudonymisation)?
- What has happened to the data?
- What could the data tell a third party about the data subject

- What are the likely consequences of the personal data breach on the Pre-School?
- Any other wider consequences which may be applicable?

### **Preventing Future Breaches**

Once the data breach has been dealt with, the Pre-School will consider its security processes with the aim of preventing further breaches. In order to do this, we will;

- Establish what security measures were in place when the breach occurred
- Assess whether technical or organisational measures can be implemented to prevent the breach happening again
- Consider whether there is adequate staff awareness of security issues and look to fill any gaps through training or tailored advice
- Consider whether it's necessary to conduct a privacy or data protection impact assessment
- Consider whether further audits or data protection steps need to be taken
- Update the data breach register
- Debrief governors/management following the investigation.

### **Reporting Data Protection Concerns**

Prevention is always better than dealing with data protection as an after-thought. Data security concerns may arise at any time and we would encourage you to report any concerns (even if they don't meet the criteria of a data breach) that you may have to the management team or data manager. This can help capture risks as they emerge, protect the Pre-School from data breaches and keep our processes up to date and effective.

### **Monitoring**

We will monitor the effectiveness of this and all of our policies and procedures and conduct a full review and update as appropriate. Our monitoring and review will include looking at how our policies and procedures are working in practice to reduce the risks posed to the Pre-school.

### **Further guidance**

Advice and guidance through all stages of a data breach can be sought through the ICO. Information you will need to tell them will be; what has happened, when and how you found out about the breach, the people that have been or may be affected by the breach, what you are doing as a result of the breach and who we should contact if we need more information and who else you have told.

**ICO Helpline – 0303 123 1113** – Monday to Friday between 9am and 5pm.

### **Data Retention and Deletion**

New GDPR requirements in terms of data retention help us to truly think and justify why we hold onto data, challenging the instinctive 'hoarder' mentality. Due to the nature of our business we are required to hold onto data for longer than it is being processed for. Such instances would be safeguarding files of children who have left the pre-school, child developmental records retained for Ofsted inspections (who like to see a cycle of two years data), financial accounts and employee details after they have left the business. To support us in how long we keep data we follow the Pre-School Learning Alliance retention period records.

[https://www.pre-school.org.uk/sites/default/files/retention\\_periods\\_for\\_records\\_may\\_2018.pdf](https://www.pre-school.org.uk/sites/default/files/retention_periods_for_records_may_2018.pdf)

### **Process for archiving/deletion**

After a child has left our care we would;

- Transfer their Tapestry account to the parent/carer via a pen stick and then delete their account off the software.
- With parental permission at the end of each year we would take photos from Tapestry to make a photobook which would stay in the setting as a historical record of the children, who attended the pre-school over the years.
- Shred any physical photographs we have of the children in the setting.
- We would transfer copies of data to receiving settings/school, this would include developmental records, safeguarding files, and SEND information. Where possible this would be supported by a face to face or telephone conversation discussing the needs of the child to secure a positive transition.
- Remove parents/carers emails from our email accounts.
- Remove phone numbers of parents/carers from our Pre-School mobiles.

- We would remove and shred any irrelevant information held on the child's file i.e. all about me sheet, collection forms etc. Data that was to be kept will be scanned and stored on an external hard drive which is stored in a locked cupboard when not in use. This hard drive is used specifically for the archiving of data. Once data has been scanned, we would shred the original documents.
- Tapestry data will be kept in the original file and then shredded after the two-year period is up.
- SEND data will be scanned and archived.
- Accident forms will be scanned but the original will also be kept in the previous children accident file and stored securely.

### **Storage of data**

Data within the setting is stored in different areas of the building, as we run our business from a shared building extra precautions have to be made to ensure we are acting with due diligence when storing data. Risk assessments help us to identify and mitigate risk and are completed and reviewed annually however for the purposes of this policy below is a simple diagram highlighting general housekeeping rules to follow.

Photographs of staff and children in the setting	Curtains cover many of the boards displaying photos. For those that don't have curtains, boards are stripped when the building has other users.
Registers, sign in sheets and visitor signing in	Stored in a locked cabinet in the foyer. Accident forms or any other correspondence to parents are placed in envelopes and locked away.
Office area	Clear desk policy where all information that is classified as personal data is locked away
Ipads	Photos are deleted weekly off the iPad and uploaded directly to Tapestry.

## **Steps to ensure GDPR Confidence and Compliance**

This policy aims to demonstrate how we as a business;

*Review our current processes to identify any compliance issues or concerns*

We do this by;

- ✓ Completing a data inventory and audit which is reviewed annually
- ✓ GDPR is on every staff/management meeting agenda
- ✓ Seek advice from an external expert in GDPR compliance
- ✓ Hold a current registration with the ICO and use their website to keep up to date

*Ensure everyone understands GDPR, their responsibilities with personal data and the significance of being compliant*

We do this by;

- ✓ Publishing this policy to all employees
- ✓ Publishing a privacy notice to all employees, and users of our services
- ✓ Data manager completes regular training to keep herself well informed of data protection issues

*Conduct a thorough audit to examine current practices and procedures and identify actions to safeguard the Pre-School and achieve compliance*

We do this by;

- ✓ Complete risk assessments to identify collecting, processing, storing, sharing and deletion of data.
- ✓ Put procedures in place to mitigate risks identified.
- ✓ Have procedures in place to deal with a data breach
- ✓ Annual group training to identify the flow of data through the setting.
- ✓ Have a subject access request procedure

*Stay up to date with data protection best practice and continue to monitor compliance*

We do this by;

- ✓ Keeping informed through the ICO website
- ✓ Have open dialogue about GDPR fostering a culture of reflection and challenge to how we process data
- ✓ Have a data breach procedure

**For further information please see the ICO website <https://ico.org.uk/>**

## Admissions Policy

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### **Introduction**

The emotional, social and physical development of young children has a direct effect on their overall development and on the adult, they will become. That is why understanding the need to invest in very young children is so important, so as to maximise their future well-being. The early years are a time when the brain develops and much of its 'wiring' is laid down. A child's relationships and experiences during the early years greatly influence how their brain grows. It is our intention to make our pre-school accessible to children and families from all sections of the community.

### **Our Aim**

We aim to ensure that all sections of our community have access to the pre-school through open, fair and clearly communicated procedures.

### ***Promoting a sense of belonging for all;***

We are proud to have 'community' in our name and take great pride in being the heart of the community, engaging with local residents and businesses. We engage in intergenerational projects to support the children's self-esteem and sense of belonging and make regular visits to local places of interest.

Pinvin Community Pre-school is managed by a committee of parents, who help drive forward the future plans for the pre-school, they have ownership of the pre-school and have a valuable role in their child's education. Should parents not join the committee they are still invited to be a huge part of their child's time with us, with many opportunities to come into the setting to be with their children for stay and plays or special events. They are consulted on changes to practice and are encouraged to feedback to us on a regular basis informally and formally in the form of questionnaires.

## **Applications**

We ensure that information about our pre-school is accessible - in written and spoken form - and, where appropriate, in different languages. Where necessary, we will try to provide information in Braille, or through signing or an interpreter.

We arrange our waiting list in birth order. In addition, our policy may take into account the following:

- ✓ The vicinity of the home to the pre-school.
- ✓ Siblings already attending the pre-school.

We keep a place vacant, if this is financially viable, to accommodate an emergency admission.

## **Fully Inclusive**

- We describe our pre-school and its practices in terms which make it clear that it welcomes fathers and mothers, other relations and other carers, including child-minders.
- We describe our pre-school and its practices in terms of how it treats individuals, regardless of their gender, special educational needs, disabilities, background, religion, ethnicity or competence in spoken English.
- We describe our pre-school and its practices in terms of how it enables children with disabilities to take part in the life of the pre-school.
- We make our equal opportunities policy widely known.
- We are flexible about attendance patterns to accommodate the needs of individual children and families.
- We have an open-door policy and parents are assured that staff are always happy to listen and help should any problems arise with their child and that any concerns will be dealt with confidentially.

## **Nursery Education Funding (NEF)**

All 3 and 4-year-old children, as well as some 2-year-old children, are entitled to 15 hours of free early education and childcare per week, for 38 weeks of the year.

Some 3 and 4-year-old children are also entitled to an additional 15 hours per week (known as 30 hours funding).

Any Ofsted registered early years provider is eligible to sign up with Worcestershire County Council to offer these hours. All early year's providers who wish to offer free places for two, three and four-year-old children within Worcestershire, must be registered with Worcestershire County Council to be included on the Worcestershire Directory of Funded Providers.

By registering, early years providers agree to abide by the national guidance document: 'Early Education and Childcare; Statutory Guidance for Local Authorities', June 2018 and the local guidance document 'The Worcestershire Provider Agreement. This is issued annually and a copy of this is kept in the funding file. For a copy of the agreement email: [NEF@worcschildrenfirst.org.uk](mailto:NEF@worcschildrenfirst.org.uk)

All providers wishing to offer Nursery Education Funding must deliver the Early Years Foundation Stage in line with all principles and requirements, as set out in the 'Statutory Framework for the Early Years Foundation Stage 2018

Providers who are judged by Ofsted as 'Inadequate' are unable to register to offer NEF in Worcestershire.

Providers who are judged by Ofsted as 'Requires Improvement' are unable to register to offer Two-Year-Old Funding in Worcestershire.

### **When a child starts at the setting**

The setting must check the date of birth of every child who they claim Nursery Education Funding (NEF) for. This includes two-year-old funding, universal 3 and 4-year-old funding and those accessing 30 hours free childcare. If we offer a place to a child who does not meet the appropriate age to access NEF, we will not be able to claim funding for them. To be eligible for funding, children must meet the following age criteria before any other criteria can be applied:

<b>Children who turn two/three years of age between;</b>	<b>Term that two/three-year-old funding commences:</b>
1st April and 31st August	Autumn Term (September)
1st September and 31st December	Spring Term (January)
1st January and 31st March	Summer Term (April)

The annual entitlement of 570 Universal hours and 570 Additional hours (where applicable) will always start in September and finish in August. No child will be able to access more than 570 or 1140 hours during this period.

### **Parental declaration form**

To claim NEF all parents, need to complete an annual Parent Declaration Form, this confirms the total number of hours that their child is attending per week. This form also has useful links to support families in applying for eligible funding.

### **Split settings**

Where children attend more than one setting, they can choose how to split their funding on the parental declaration form. The allocation of hours must be in line with the settings offer of free places and cannot be altered until the end of each term.

### **Settings offer**

It is at the settings discretion how the universal and additional hours are offered. This offer should be made clear to parents with transparency regarding any additional costs. We currently offer 15 and 30 hours between the hours of 9 to 3pm 5 days a week for 38 weeks of the year.

## Parent Declaration Form for Funded Early Education Places for 2, 3- and 4-year olds

To receive your child's funded Nursery Education entitlement, this form must be completed accurately at each of the settings your child attends. You should discuss the options available with your child's setting, to ensure that you are able to take up your child's entitlement in the way that you wish.

### 1: Child's Details

Child's Legal Forename(s):	
Child's Legal Family Name:	
Name by which the child is known: (if different from above)	
Child's Date of Birth:	
Proof of Date of Birth provided:	<b>YES / NO</b> Documentation provided:
Child's Gender:	
Child's Address:	
Child's Postcode:	

**The following question is optional.** The information provided will be stored by your child's setting in line with their Data Protection Policy and will be shared with Worcestershire County Council and the Department for Education, as part of their claim for Nursery Education Funding. If you no longer wish to have your child's ethnicity processed, you can withdraw your consent to your child's setting at any time

Child's Ethnicity:	(optional)
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### 2: Parent / Carer's Details

**IMPORTANT:** The following information needs to be provided if you are accessing **30 Hours Free Childcare, Early Years Pupil Premium** or the **Disability Access Fund** for your child.

Parent/Carer Forename: (person named on benefits claim)	
Parent/Carer Family Name:	
Parent/Carer Date of Birth:	
Parent/Carer National Insurance Number/NASS Number:	
2 <sup>nd</sup> Parent/Partner Forename:	
2 <sup>nd</sup> Parent/Partner Family Name:	
2 <sup>nd</sup> Parent/Partner Date of Birth:	
2 <sup>nd</sup> Parent/Partner National Insurance Number/NASS Number:	

### 3: Funding Entitlements

Detailed information about each of the funding entitlements can be found on pages 5 – 6.

Please indicate which of the following funding entitlements you wish to claim for:

Funding Entitlement	Confirmation										
<p>Two Year Old Funding</p> <p>Applications can be made at <a href="http://www.worcestershire.gov.uk/freechildcare">www.worcestershire.gov.uk/freechildcare</a></p>	<p>Have you applied for Two-Year-Old Funding in Worcestershire and received a <b>Certificate of Eligibility</b>?</p> <p><b>YES / NO</b> (delete as appropriate)</p> <p>If you have ticked 'YES', please enter the Reference Number from the Certificate of Eligibility: <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/></p> <p>Please give a copy of your Certificate of Eligibility to your child's setting.</p>										
<p>30 Hours Free Childcare for eligible 3 &amp; 4 year old children</p>	<p>Please enter your <b>30 Hours Free Childcare Code</b>:</p> <table border="1" data-bbox="791 880 1374 938"> <tr> <td><input type="text"/></td> </tr> </table>	<input type="text"/>									
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>		
<p>Early Years Pupil Premium for eligible 3 &amp; 4 year old children</p>	<p>Are you in receipt of any qualifying <b>benefits</b>? (<i>Further information can be found on page 6</i>):</p> <p><b>YES / NO</b> (delete as appropriate)</p> <p>Is your child currently, or have they been, looked after by the Local Authority?</p> <p><b>YES / NO</b> (delete as appropriate)</p> <p>If you have ticked 'YES', please ensure you have completed Section 2 (Parent/Carer Details) on page 1.</p>										
<p>Disability Access Fund for eligible 3 &amp; 4 year old children</p> <p>A copy of your child's DLA letter must be provided to the setting.</p>	<p>Is your child in receipt of <b>Disability Living Allowance</b>? (<i>Further information can be found on page 6</i>)</p> <p><b>YES / NO</b> (delete as appropriate)</p> <p>If your child is receiving their free entitlement at more than one setting, please nominate the setting you wish to receive the Disability Access Fund.</p> <p><b>Name of Setting:</b></p>										

#### 4: Please allocate your child's FUNDED hours below:

If your child is entitled to Two-Year-Old Funding or Universal entitlement for 3 & 4-Year-Old Funding, please allocate up to 15 'Universal' hours. If your child is entitled to the 30 Hours Free Childcare for 3 & 4-Year-Old Funding, please allocate up to 15 'universal' hours and up to 15 'additional' hours. Unless you are advised by your child's setting, please **split your child's funded hours equally between 'universal' and additional'**.

If your child is attending a specialist setting (e.g. Special School Nursery Class/Early Years Specialist Language Unit/Nursery Assessment Class), they must be allocated 'universal' hours to cover the number of hours your child attends.

Your allocation of funded hours must be in line with what is offered by your child's setting. Once you have allocated your child's funded hours, you will not be able to change your child's setting or reduce their funded hours until the end of each term.

Name of Setting:	Mon	Tues	Weds	Thurs	Fri	Total hours attended per week	Total number of weeks per year to receive funded hours (eg. 38, 51)
Universal hours (max. 15)							
Additional hours (max. 15)							
Non-Funded hours							

If your child attends any other settings, please enter the information in the table(s) below:

	Mon	Tues	Weds	Thurs	Fri	Total hours attended per week (including non-funded hours)	Total number of weeks per year to receive funded hours (eg. 38, 51)
Name of 2 <sup>nd</sup> Setting:							
Universal hours							
Additional hours							
Name of 3 <sup>rd</sup> Setting:							
Universal hours							
Additional hours							
Total Funded Hours attended per week (including hours accessed at all settings)							
Total Funded Hours attended per year (weekly funded hours x number of funded weeks)							

You can request a copy of your 'child-based statement' from your child's setting to confirm the number of funded hours that your child has accessed during the year.

It is a requirement of the Early Years Foundation Stage (EYFS) for settings to communicate with each other and share information about your child, if your child is attending more than one setting. This will include information contained within this form.

#### 5: Privacy Information

The information provided within this form will be processed by your child's setting, to enable them to claim Nursery Education Funding. The information will be securely shared with Worcestershire County Council and the Department for Education, to provide your child's funded hours. The information will also be shared with Worcestershire Children First, by Worcestershire County Council to deliver education services on their behalf.

Further information about how Worcestershire County Council will use your/your child's data can be found within their Privacy Notice: [www.worcestershire.gov.uk/privacy](http://www.worcestershire.gov.uk/privacy)

#### 6: Parent/Carer Declaration

Please sign to confirm that:

- I certify that all the details provided above are correct.
- The setting(s) named above will claim funding based on the information I have provided.
- The setting(s) named above will claim for additional funding as appropriate (which may include funding to support inclusive practice for children with additional needs), to support them to provide the free Early Education Place for my child.
- I understand that I will have to pay a bill to my setting(s), even after my child has stopped attending, if the information I provide is incorrect.
- I understand that in order to claim the 'additional' 15 hours (30 Hours Free Childcare), I must re-confirm my eligibility every three months with HMRC and that if I fail to do so, I will be liable to pay for any hours not funded by the local authority.
- I understand that my details and my partners, where applicable, will be used to apply for EYPP and to confirm eligibility for 30 Hours Funded Childcare, as appropriate.
- I understand that I must amend this form/complete a new form if my details, circumstances or attendance patterns change.
- I understand that my child's allocated funding will not be moved during each funding period.

Parent/Carer Signature:	
Date:	
2 <sup>nd</sup> Parent/Partner Signature:	
Date:	

#### 7: Provider Declaration

Please sign to confirm that:

- You have provided the parent/carer with accurate information about Nursery Education Funding.
- You are offering a funded place as outlined above.
- The hours allocated total no more than a maximum entitlement of 570 annual 'universal' or 'additional' hours.

Signed:	
Provider Name:	
Date:	

## Parent Declaration Form - Supporting Information

Please retain this information for your records.

### 1: Two-Year-Old Funding

Some two-year-old children are entitled to free childcare from the term after their 2<sup>nd</sup> birthday – 1<sup>st</sup> January, 1<sup>st</sup> April or 1<sup>st</sup> September. Information about the eligibility criteria and how to apply can be found at:

[www.worcestershire.gov.uk/frechildcare](http://www.worcestershire.gov.uk/frechildcare).

Funding for eligible two-year-old children is based on 15 free hours per week, over 38 weeks of the year. You can choose to spread your child's hours over more than 38 weeks of the year, for example over 51 weeks. This would mean that your child would access less than 15 free hours per week. You can choose to receive funded hours at a maximum of two settings in any one day. A maximum of 10 hours can be funded per day.

Your child's setting(s) can choose how they offer the free entitlement. Please discuss your requirements with each setting before completing this form to ensure that what they offer meets your needs. Your child's setting will claim funding based on the information you provide. You may find that you are left with a bill from your child's setting if you do not complete the form accurately and funding is therefore not allocated appropriately. You will need to complete a Parent Declaration Form for each setting that your child attends.

### 2: 3 & 4-Year-Old Funding - Universal 15 Hours

Your child is entitled to 570 '**universal**' free hours per year, which is a maximum of 15 hours per week over 38 weeks of the year, from the term after your child's 3<sup>rd</sup> birthday – 1<sup>st</sup> January, 1<sup>st</sup> April or 1<sup>st</sup> September. You can choose to spread your child's hours over more than 38 weeks of the year, for example over 51 weeks. This would mean that your child would access less than 15 '**universal**' hours per week. You can choose to receive funded hours at a maximum of two settings in any one day. A maximum of 10 hours can be funded per day.

Your child's setting(s) can choose how they offer the free entitlement. Please discuss your requirements with each setting before completing this form to ensure that what they offer meets your needs. Your child's setting will claim funding based on the information you provide. You may find that you are left with a bill from your child's setting if you do not complete the form accurately and funding is therefore not allocated appropriately. You will need to complete a Parent Declaration Form for each setting that your child attends.

If your child is attending a specialist setting (e.g. Special School Nursery Class/Early Years Specialist Language Unit/Nursery Assessment Class), they must be allocated '**universal**' hours to cover the number of hours your child attends.

### 3: 3 & 4-Year-Old Funding - Additional 15 Hours (30 Hours)

If your child is aged 3 or 4 years of age and you (and your partner if applicable) meet the criteria, your child could be entitled to a total of 30 hours childcare per week. Please visit [www.childcarechoices.gov.uk](http://www.childcarechoices.gov.uk) to find out more information and apply for your 30 Hours Free Childcare Code.

If you have received a 30 Hours Free Childcare Code, please enter the Code onto the Parent Declaration Form.

If you have provided a valid '30 Hours Eligibility Code' above, your child is entitled to a further 570 '**additional**' hours per year. The '**additional**' hours will start from the beginning of the next funding period - 1<sup>st</sup> January, 1<sup>st</sup> April or 1<sup>st</sup> September. If at any point during the year your child stops being eligible for the '**additional**' hours, your child's free entitlement will be based on the '**universal**' allocation above. You must also discuss your child's attendance hours with their setting(s), to ensure that they are still able to offer the hours that you need. When you allocate your child's hours, we recommend that unless you are advised differently by your child's setting, you should allocate the hours equally between '**universal**' and '**additional**'.

#### 4: 3 & 4-Year-Old Funding - Early Years Pupil Premium

The Early Years Pupil Premium (EYPP) is an additional sum of money used to enhance the quality of your child's early years' experience by improving the teaching and learning, facilities and resources of a setting, with the aim of impacting positively on your child's progress and development.

It is paid to settings for 3 & 4-year-old children of families in receipt of certain benefits. Applicable benefits include:

- Income support
- Income-based Jobseekers Allowance
- Income-related Employment and Support Allowance
- Support under part 5 of the Immigration and Asylum Act 1999
- The guaranteed element of State Pension Credit
- Child Tax Credit (provided you are not entitled to Working Tax Credit and have an annual income of no more than £16,190)
- Working Tax Credit run-on
- Universal Credit (with a net income threshold of £7,400).

It is also available for children who are or have been looked after (CLA) by the Local Authority.

If your child is entitled to EYPP, it will only be paid to the setting(s) receiving the 'universal' hours. For more information, please speak to your child's setting.

If you believe your child is entitled to EYPP, please indicate this on the Parent Declaration Form. Accessing EYPP will have no impact on your finances or access to any benefits.

#### 5: 3 & 4-Year-Old Funding - Disability Access Fund

Three and four-year-old children who are in receipt of child Disability Living Allowance (DLA) and are receiving all or part of their free entitlement, are eligible for the Disability Access Fund (DAF). The DAF is paid to your child's setting to ensure that they can support your child's needs. The DAF is a fixed annual payment of £615.

If your child is in receipt of DLA, you will need to allocate the DAF on the Parent Declaration Form and provide a copy of your child's DLA to your child's setting. If your child is accessing their free entitlement at more than one setting, you will have to choose which setting to allocate it to. We recommend that this is the setting where your child spends the majority of their funded hours.

Once the DAF payment has been made, it cannot be moved. To ensure that you are happy with your choice, the School's Finance Team will require you to confirm your choice; if you have provided consent they will contact you directly, if you have not given consent, you will need to email the team directly at [eyfunding@worcestershire.gov.uk](mailto:eyfunding@worcestershire.gov.uk) to confirm your choice.

## Childcare Choices

Tax-Free Childcare is a government scheme to support working parents with childcare costs. If eligible, parents can set up an online childcare account which they can use to pay invoices directly. For every £8 they pay in, the government will pay in an extra £2. Parents can get up to £2,000 per child per year, or £4,000 for disabled children.

Childcare choices have replaced the previous childcare voucher scheme which closed for new entrants in October 2018. Parents can still use the childcare voucher scheme providing they remain in continuous employment with the original employer.

<https://www.childcarechoices.gov.uk/providers/>

### Claiming for 2-year-old funding

Some 2-year olds are eligible for funding, dependent on their family income. For more information parents can visit <http://www.worcestershire.gov.uk/2yearfunding>

Applications can be made online or from downloading a paper form.

[https://eycportal.worcestershire.gov.uk/SynergyWeb\\_LIVE/Parents/default.aspx](https://eycportal.worcestershire.gov.uk/SynergyWeb_LIVE/Parents/default.aspx)

### Claiming for 30 hours funding

There is one application for 30 hours free childcare and tax-free childcare.

Application is completed on-line and if parents are eligible, they will receive a code which must be given to the provider. Every 3 months the parent must confirm their details to ensure the code remains valid. <https://www.childcarechoices.gov.uk/>

### Pupil Premium

The Early Years Pupil Premium is an extra payment paid directly to childcare providers for the universal 15 hours only (not for 30 hours or for 2-year olds). Pupil premium can provide an extra £300 per year for children whose families are in receipt of certain benefits or children who have been in care or adopted from care.

The setting can use the funding in any way they choose to improve the quality of the early year's education, however decisions on how this is spent should be made in conjunction with parents. It should not be used to reduce costs the family currently pay. Examples of how this has historically been used include, speech and language resources for the home, specialised sessions i.e. swimming, hot meals, or additional

sessions to support regular attendance. Each individual case should be considered carefully to ensure the funding makes a real difference to the child.

Providers establish which families are eligible through the completion of the parent declaration form. The money gets paid with the normal NEF entitlement. How the money is spent and the outcomes from this must be documented for audit and Ofsted purposes.

### **Disability Access Fund**

If a 3 or 4-year-old is in receipt of Disability Living Allowance (DLA) then as a childcare provider we can access a Disability Access Fund. This is £615 a year that goes to the childcare provider of the parents' choice and supports the provider to meet the child's needs. Parents will state if their child receives DLA on the parental declaration form. Where they are using more than one provider, the parents can decide which provider receives the fund, as it can only go to one provider.

### **Inclusion Funding**

All providers must have a clear approach to assessing children's special educational needs and/or disabilities, and their approach should be understood and followed by the whole team in group settings. Childcare settings that offer NEF are entitled to receive an inclusion supplement up to the maximum of 15 hours. This supplement is based on the level of provision required to meet the child's needs and should be allocated to additional staffing, specialist consultancy services and appropriate specialist resources. If the child is in a split setting this fund may be distributed between the two settings unless the alternative placement is 'specialised' whereas they would receive all of the funding.

The document 'Ordinarily available in Worcestershire Early years settings' details what the local authority expects to be made ordinarily available to all children within early years settings, through a graduated response of support and intervention. This document clearly sets out the criteria for applying for additional funds and if in receipt of these the providers commitment to the child in terms of intervention and support.

Any additional funds applied for must be with written parental consent and the allocation of funds discussed with them. The use of funds will be monitored by the inclusion team at regular intervals and it is the providers responsibility to ensure the effective use of additional funds, improving outcomes for the child.

<b>Code of practice level</b>	<b>Inclusion supplement per child per hour (max 15 hours)</b>
Graduated response 2	0.74 per hour (3-4-year olds only)
Graduated response 3	£1.44 per hour Refer to preschool forum
Graduated response 4	£2.70 per hour
Exceptional early years funding	£6.30 per hour
Disability Access Fund (DAF)	£615 annual payment. 3-4-year olds in receipt of disability living allowance

When completing paperwork for requesting inclusion supplement funding there are specific deadlines to meet. It is good practice for the settings SENCO to complete this process in line with the financial controller to ensure a successful application. Application forms and important information can be found at;

<http://www.worcestershire.gov.uk/WCFEducationServices/info/31/early-years-inclusion/67/early-years-inclusion-z-resources/3>

<b>Term</b>	<b>Deadline for application form to reach inclusion team</b>	<b>Decision panel meeting</b>
Autumn Term 2020	2 October 2020	7 October 2020
Spring Term 2021	20 November 2020	25 November 2020
Spring Term 2021	22 January 2021	27 January 2021
Summer Term 2021	5 March 2021	10 March 2021

Additional financial support is available through grant schemes such as The Family fund who help to fund essential items required when raising a disabled or seriously ill child. This is applied for directly by the family.

<https://www.familyfund.org.uk/>

## **NEF Audits**

NEF Audits are carried out to ensure that all settings who are funded to deliver NEF within Worcestershire are adhering to the Worcestershire Provider Agreement and are therefore allowing families to access their free entitlement.

NEF Audits are carried out to confirm:

- accuracy of funding claims
- accuracy of funding payments, including Inclusion funding
- adherence to the Worcestershire Provider Agreement
- parents are able to access their child's free entitlement without having to pay any additional fees

Providers who have been selected for a NEF Audit will need to present the following information:

- copies of registers (daily attendance sheets) for one week at the beginning and one week at the end of the audited term
- copies of all Parent Declaration Forms for the audited term
- copies of all parental invoices/bills/statements for a period within the audited term
- evidence supporting the level of need for any funded child receiving an inclusion supplement
- details of the way in which providers offer the free entitlement, which should include
  - a copy of the fee structure
  - a copy of a registration form/contract
  - any funding related information used by the provider for parents/carers

Providers can choose how they offer Nursery Education Funding at their setting, as long as they follow the national guidance:

- no session to be longer than 10 funded hours
- funded hours cannot be offered before 6.00am or after 800pm
- funded hours must be offered as a continuous session, without 'artificial breaks'.

Parents and carers must be given clear information about what is on offer at a setting. This must include what is available for 'free' as part of the funded hours

along with the cost of additional hours and services which parents/carers can choose to access.

Parents and carers can be charged a deposit to secure their child's free place, however this must be refunded by the end of the first term of attendance.

Providers can choose to limit the number of free places available at the setting. The criteria for allocating these places must be clearly set out in their admissions policy. The admissions policy should be available to all parents/carers.

## **Removal of NEF**

Providers may also be removed from the Worcestershire Directory of Funded Providers if they:

- fail to supply adequate information to complete a NEF Audit
- do not adhere to the 'Early education and childcare: Statutory guidance for local authorities', June 2018 and/or the Worcestershire Provider Agreement
- fail to complete the annual Early Years Census

Removal of funding process

### **If a provider is judged to be 'Requires Improvement', 'Not Met' or 'Inadequate' by Ofsted:**

- upon publication of the Ofsted report, providers will be expected to submit a list of children who are currently registered to access NEF or who are due to start accessing NEF within the next half of the term. These families will be given notice of the removal of funding from their child's provider. The provider will be expected to submit a list on the Children's Services Portal to include:
  - full name of child
  - date of birth
  - address
  - registered attendance pattern (including days and times)
- children who are not included on this list will not receive NEF after the publication of the Ofsted report

- an **NEF Sufficiency Assessment** will be conducted to ensure that alternative provision is available within the locality of the provider. Where it can be evidenced that there is no alternative provision available for an individual child, it may be possible for the family to continue using the provider
- the NEF Sufficiency Assessment will be completed by the NEF Team. Based on the results of the NEF Sufficiency Assessment, a recommendation will be shared with the Early Years Steering Group for approval by the Assistant Director of Education and Skills. A copy of the completed NEF Sufficiency Assessment will be available upon request by the provider
- notice will be given to the provider within four weeks of the judgement being published. Families of funded children will also be notified that funding will be removed from their child's provider. Funding will cease from half-term or term break, depending upon the number of weeks remaining in the period, ensuring that at least 6 (calendar) weeks' notice is given

### For further information

Two-year-old funding Email: <a href="mailto:twoyearoldfunding@worcestershire.gov.uk">twoyearoldfunding@worcestershire.gov.uk</a>
Three and four year old funding Email: <a href="mailto:NEF@worcschildrenfirst.org.uk">NEF@worcschildrenfirst.org.uk</a>
Business Support Email: <a href="mailto:CShotton@worcschildrenfirst.org.uk">CShotton@worcschildrenfirst.org.uk</a>
NEF Payments Email: <a href="mailto:eyfunding@worcestershire.gov.uk">eyfunding@worcestershire.gov.uk</a>

## Parental Involvement Policy

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We believe that children benefit most from Early Years education and care when parents and settings work together in partnership. Our aim is to support parents as their children's first and most important educators by involving them in their children's education and in the full life of our pre-school. We also aim to support parents in their own continuing education and personal development.

### Procedures

In order to fulfil our aims, we;

- ✓ Are committed to ongoing dialogue with parents to improve our knowledge of the needs of their children and to support their families.
- ✓ Inform all parents about how our pre-school is run and its policies through access to written information and through regular informal communication. We check to ensure parents understand the information that is given to them.
- ✓ Encourage and support parents to play an active part in the governance and management of our pre-school.
- ✓ Inform all parents on a regular basis about their children's progress.
- ✓ Involve parents in the shared record keeping about their children - either formally or informally - and ensure parents have access to their children's written developmental records.
- ✓ Tapestry learning journals allow parents to observe how we support their child's development through play.
- ✓ Provide opportunities for parents to contribute their own skills, knowledge and interests to the activities of our pre-school.
- ✓ Inform parents about relevant conferences, workshops and training.
- ✓ Consult with parents about the times of meetings to avoid excluding anyone.
- ✓ Provide information about opportunities to be involved in our pre-school in ways that are accessible to parents with basic skills needs, or those for whom English is an additional language.
- ✓ Hold meetings in venues that are accessible and appropriate for all.
- ✓ Welcome the contributions of parents, in whatever form these may take.
- ✓ Inform all parents of the systems for registering queries, complaints or suggestions and check to ensure these are understood. All parents have access to our written complaint's procedure.

- ✓ Provide opportunities for parents to learn about the curriculum offered in our pre-school and about young children's learning, in our pre-school and at home.
- ✓ Provide all parents with a welcome pack.

## Communication

We communicate through various methods to ensure we are accessible to all parents and families;

- Website
- Home-link
- Key person meetings
- Committee meetings
- Workshops
- Open days
- Parent evenings
- Home visits
- Face to face communication
- Written letters
- Email
- Private social media group
- Weekly parent drop in sessions
- Pre-school You Tube channel to share learning in the home
- Signposting to resources to support parenting



## Children's Records

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We have record keeping systems in place that meet legal requirements as written in our GDPR compliance policy and data inventory.

[https://pinvinpreschool-my.sharepoint.com/:x:/g/personal/office\\_pinvinpreschool\\_org/EVI56l351d9lrzQgWGhR5lgBAKVlqefm-1R8VnGcfRjTOQ?e=CUmea](https://pinvinpreschool-my.sharepoint.com/:x:/g/personal/office_pinvinpreschool_org/EVI56l351d9lrzQgWGhR5lgBAKVlqefm-1R8VnGcfRjTOQ?e=CUmea)

This policy and procedure should be read in conjunction with the Confidentiality and Client Access to Records policy and the Information Sharing policy.

We keep two types of records on children attending our setting:

### Developmental Records

These include observations of children in the setting, photographs, video clips, and samples of their work and summary developmental reports. These are stored on Tapestry and can be freely accessed by parents and key persons.

### Personal Records

These include;

<b>1</b>	Registration and admission forms
<b>2</b>	Correspondence concerning the child or family
<b>3</b>	An on-going record of relevant contact with parents
<b>4</b>	Signed consent forms
<b>5</b>	Reports or minutes from meetings concerning the child from other agencies
<b>6</b>	Observations by staff on any confidential matter involving the child, such as developmental concerns or child protection matters

These confidential records are stored in a lockable cabinet and are kept secure by the Manager.

Parents have access, in accordance with our GDPR Compliance Policy, to the files and records of their own children, but do not have access to information about any other child.

Staff will not discuss personal information given by parents with other members of staff, except where it affects planning for the child's needs. Staff induction includes an awareness of the importance of confidentiality in the role of the key person.

We retain children's records for three years after they have left the setting, except records that relate to an accident or child protection matter, which are kept until a child reaches the age of 25 years. These are kept securely in line with our GDPR compliance policy.

Please see the settings Data Inventory for more specific information.

### **Other Records**

We keep a daily record of the names of the children we are caring for, their hours of attendance and the names of their key person.

Issues to do with the employment of staff, whether paid or unpaid, remain confidential to the people directly involved with making personal decisions.

## Provider Records

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We keep records and documentation for the purpose of maintaining our business. These include;

- Records pertaining to our registration
- Landlord and other contractual documents
- Financial records pertaining to income and expenditure
- Risk assessments
- Employment records of staff including their name, home address and telephone number
- Name, addresses and telephone numbers of anyone else who is regularly in unsupervised contact with the children.

We consider our records as confidential based on the sensitivity of information, such as with employment records. These confidential records are maintained in conjunction with our GDPR compliance policy, with regard to the framework of the Data Protection Act (2018) and the Human Rights Act (1998).

### **Procedures**

All records are the responsibility of the management team who ensure they are kept securely.

All records are kept in an orderly way in files and filing is kept up to date.

Financial records are kept up to date for audit purposes.

Health and Safety records are maintained; these include risk assessments, details of checks or inspections and guidance etc.

Our Ofsted registration certificate is displayed.

Our Public Liability insurance certificate is displayed.

All our employment and staff records are kept securely and confidentially.

**We notify Ofsted of any change;**

- To the address of the business
- To the premises which may affect the space available to us or the quality of childcare we provide
- To the name and address of the provider, or the provider's contact information
- To the person managing the provision
- Any significant event which is likely to affect our suitability to look after children
- Any other event as detailed in the Statutory Framework for the Early Years Foundation Stage (DfE 2012).

## Transfer of Records to School and Other Settings

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We recognise that children sometimes move to another early years setting before they go on to school, although many will leave our setting to enter a nursery or reception class. We understand our role in ensuring information goes with that child to help the child's transition into their new setting smooth for both the child and families.

### **Our Aim**

- ✓ To prepare children for these transitions and involve parents and the receiving setting or school in this process.
- ✓ To prepare and share records about a child's development and learning within the Early Years Foundation Stage.
- ✓ To ensure confidential records are shared where there have been child protection concerns according to the process required by our Local Safeguarding Children Board.

The procedure guides this process and determines what information we can and cannot share with a receiving school or setting.

### **Transfer of development records for a child moving to another early years setting or school;**

When a child transfers to school or another setting, we feel it is important that the receiving school/setting understands the child holistically and as an individual. In preparation for the transition the key person alongside the manager will create a Pen Portrait of the child which documents 'A day in the life of ..... at Pinvin Community Pre-School'. This will be an informative document that considers the uniqueness of the child, how they settle, their interests and how they present in the setting. This will be shared with the parents, receiving setting and placed on the child's file.

In addition to the pen portrait we will provide the receiving setting with accurate assessment data taken from the 'Development Matters' in the Early Years Foundation Stage guidance. This will show how the children have progressed over their time with us.

If there have been any welfare or protection concerns, separate documentation will be prepared by the DSL.

Due to new GDPR legislation we need to gain informed consent from the parent to contact the future setting.

### **Receiving children from other settings**

When a child comes from another setting the Manager will contact the old setting to gather any relevant information on the child to aid the settling in process.

We have developed a transfer information form for this purpose which once complete will be discussed with the key person and plans put into place if deemed necessary. This form will then be kept on the child's file.

Due to new GDPR legislation we need to gain informed consent from the parent to contact the previous setting. We will request the parent contacts the previous setting to authorise we can speak with them. If there are serious safeguarding issues where we need to contact the previous setting and we do not have gained consent we would follow our child protection procedures.

### **Transfer of Confidential Information**

The receiving school or setting will need to have a record of any safeguarding or child protection concerns that were raised in the setting and what was done about them.

A summary of the concerns will be made to send to the receiving setting or school, along with the date of the last professional meeting or case conference. We would refer to Worcestershire Safeguarding Children Boards who will stipulate the forms to be used and provide these.

Where a CAF has been raised in respect of any welfare concerns, the name and contact details of the lead professional will be passed on to the receiving setting or school. Where there has been a section 47 investigation regarding a child protection concern, the name and contact details of the child's social worker will be passed on to the receiving setting or school regardless of the outcome of the investigation.

This information is posted or taken to the school or setting, addressed to the setting or school's designated person for child protection and marked as 'confidential'.

## **Transfer of SEN & Disability Documentation**

We currently use a form to transfer information about a child with SEN and/or disabilities. The purpose of this form is to give early years settings the opportunity to provide other care/education settings and/or primary schools with information on a child's SEN and/or disabilities prior to the child's transfer. This information will then provide the setting/school with a clearer picture of the child. The SEND transfer form can be found in the SEND file.

- This form must be completed for a pre-school child if he/she is at any level of SEND i.e. from Early ID, Graduated response 1, 2, 3 or 4.
- This form must be completed in addition to the standard documents usually transferred with a child prior to their moving on to other care/education provision.
- This form must be completed at the beginning of the child's final term in pre-school.
- The document must be prepared with the parent's knowledge.
- A signed copy of this form must be forwarded onto the new school or setting. A copy must be given to the parents and another retained by the early years setting.

A face to face meeting will be arranged in the child's last term to discuss the child's current support with the receiving setting, this allows us to provide the best transition for the child and allows the receiving setting to put plans in place to best support the child. If further meetings are needed these will be diarised and given high priority.

## Confidentiality Policy

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Confidential information is information that is not normally in the public domain or readily available from another source, it should have a degree of sensitivity and value and be subject to a duty of confidence. A duty of confidence arises when one person provides information to another in circumstances where it is reasonable to expect that the information will be held in confidence.

In our setting, staff and managers can be said to have a 'confidential relationship' with families. It is our intention to respect the privacy of children and their parents and carers, while ensuring that they access high quality early years care and education in our setting.

We aim to ensure that all parents and carers can share their information in the confidence that it will only be used to enhance the welfare of their children. There are record keeping systems in place that meet legal requirements; the means we use to store and share that information takes place within the framework of the Data Protection Act (2018) and the Human Rights Act (1998).

### **Confidentiality Procedures**

We always check whether parents regard the information they share with us to be confidential or not.

Some parents may share information about themselves with other parents as well as staff; the setting cannot be held responsible if information is shared beyond those parents whom the person has 'confided' in.

Information shared between parents in discussion or training group is usually bound by a shared agreement that the information is confidential to the group and not discussed outside of it.

We inform parents when we need to record confidential information beyond the general personal information we keep for example; with regard to any injuries, concerns or changes in relation to the child or the family, any discussions with parents on sensitive matters, any records we are obliged to keep regarding action taken in respect of child protection and any contact and correspondence with external agencies in relation to their child.

All records are kept securely. Please see GDPR Compliance Policy and GDPR Data Inventory and Risk assessments.

**Client access to records:** Please see GDPR Compliance policy: Subject Access Request (SAR) procedure.

## Working in Partnership with other Agencies

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As an early year's provider, we are required to work in partnership with local and national agencies to promote the well-being of all children.

### **Procedures**

We work in partnership, or in tandem with, local and national agencies to promote the well-being of all children.

Procedures are in place for the sharing of information about children and families with other agencies. These are set out in the GDPR Compliance Policy, Safeguarding and Child Protection Policy and the Equal Opportunities and SEND policy.

Information shared by other agencies with us is regarded as third-party information. This is also kept in confidence and not shared without consent from that agency.

When working in partnership with staff from other agencies, we make those individuals welcome in the setting and their professional roles are respected.

We follow the protocols for working with agencies, for example on child protection.

Staff from other agencies do not have unsupervised access to the child they are visiting in the setting and do not have access to any other child(ren) during their visit.

Our staff do not casually share information or seek informal advice about any named child/family.

When necessary, we consult with local and national agencies who offer a wealth of advice and information that help us to develop our understanding of the issues facing us and who can provide support and information for parents. For example, ethnic/cultural organisations, drug/alcohol agencies, welfare rights advisors or organisations promoting childcare and education, or adult education.

## Making a Complaint

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Our setting believes that children and parents are entitled to expect courtesy and prompt, careful attention to their needs and wishes. We welcome suggestions on how to improve our setting and will give prompt and serious attention to any concerns about the running of the setting. We anticipate that most concerns will be resolved quickly by an informal approach to the appropriate member of staff. If this does not achieve the desired result, we have a set of procedures for dealing with concerns. We aim to bring all concerns about the running of our setting to a satisfactory conclusion for all parties involved.

### Procedures

The Statutory Framework for the Early Years Foundation Stage (2017) states;

**3.74:** Providers must put in place a written procedure for dealing with concerns and complaints from parents and/or carers, and must keep a written record of any complaints, and their outcome. ...All providers must investigate written complaints relating to their fulfilment of the EYFS requirements and notify complainants of the outcome of the investigation within 28 days of having received the complaint. The record of complaints must be made available to Ofsted or the relevant childminder agency on request.

### Making a Complaint

<b>Stage 1</b>	Any parent who has a concern about an aspect of the pre-school's provision talks over, first of all, his/her worries and anxieties with the pre-school leader
<b>Stage 2</b>	<p>If this does not have a satisfactory outcome, or if the problem recurs, the parent moves to Stage 2 of the procedure by putting the concerns or complaint in writing to the manager and the chair of the management committee.</p> <p>Most complaints should be resolved amicably and informally at Stage 1 or at Stage 2.</p>

	<p>The pre-school stores written complaints from parents in the child's file. However, if the complaint involves a detailed investigation, the pre-school leader may wish to store all information relating to the investigation in a separate file designated for this complaint.</p> <p>When the investigation into the complaint is completed, the pre-school leader meets with the parent to discuss the outcome. Parents must be informed of the outcome of the investigation within 28 days of making the complaint.</p> <p>When the complaint is resolved at this stage, the summary points are logged in the Complaints Summary Record.</p>
<b>Stage 3</b>	<p>If the parent is not satisfied with the outcome of the investigation, they can request a meeting with the manager and the chair of the management committee. The parent should have a friend or partner present if required and the manager must have the support of the registered person of the management committee, present.</p> <p>An agreed written record of the discussion is made as well as any decision or action to take as a result. All of the parties' present at the meeting sign the record and receive a copy of it.</p> <p>This signed record signifies that the procedure has concluded. When the complaint is resolved at this stage, the summarised points are logged in the Complaints Summary Record.</p>
<b>Stage 4</b>	<p>If at the Stage 3 meeting the parent and pre-school cannot reach agreement, an external mediator is invited to help to settle the complaint. This person must be acceptable to both parties, listen to both sides and offer advice. A mediator has no legal powers but can help to define the problem, review the action so far and suggest further ways in which it might be resolved.</p> <p>Charity trustees are appropriate persons to be invited to act as mediators.</p> <p>The mediator keeps all discussion confidential. They can hold separate meetings with the pre-school personnel (pre-school leader and chair of the management committee) and the parent, if this is decided to be helpful. The mediator keeps an agreed written record of any meetings that are held and of any advice they give.</p>

<b>Stage 5</b>	<p>When the mediator has concluded her/his investigations, a final meeting between the parent, the manager and the chair of the management committee is held. The purpose of this meeting is to reach a decision on the action to be taken to deal with the complaint. The mediator's advice is used to reach this conclusion. The mediator is present at the meeting if all parties think this will help a decision to be reached.</p> <p>A record of this meeting, including the decision on the action to be taken, is made. Everyone present at the meeting signs the record and receives a copy of it. This signed record signifies that the procedure has concluded.</p>
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## Ofsted

Parents may approach [Ofsted](#) directly at any stage of this complaint's procedure. In addition, where there seems to be a possible breach of our registration requirements, it is essential to involve Ofsted as the registering and inspection body with a duty to ensure the National Standards for Day Care are adhered to.

**Contact OFSTED 0300 123 1231** [www.ofsted.gov.uk](http://www.ofsted.gov.uk) These details are displayed on our settings notice board.

## Records

A record of complaints against our pre-school and/or the children and/or the adults working in our pre-school is kept, including the date, the circumstances of the complaint and how the complaint was managed. This is kept in the complaints file which is stored in a locked cabinet.

## Reviewing and Implementing Policy

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Pinvin Community Pre-school recognises its duty to safeguard children and follow the 2017 EYFS Statutory guidance to ensure we provide the very best care. This policy will ensure that we review our policies and procedures regularly, taking into consideration changes in legislation. It will also help us to ensure all policies and procedures are implemented correctly by staff, learners and volunteers ensuring consistency throughout the provision.

### **The Aims of the Pinvin Community Pre-school policies and Procedures Review and Implementation policy is to:**

- Ensure that all staff, learners and volunteers are aware of the content of the settings Policies and Procedures through;
  - ✓ Induction
  - ✓ Staff meetings and supervisions
  - ✓ Training
  - ✓ Accessibility of documents
  - ✓ Contributing to the review process
- Ensure all policies are workable documents and implemented correctly by all staff, learners and volunteers. The policies must be clear, specific and easily understood.
- To ensure that all members of staff are aware of their role and responsibility in policy and procedure implementation and understand how they contribute to a consistent approach throughout the setting.
- Ensure changes in legislation are reflected in Pinvin Community Pre-schools Policies and Procedures.
- To ensure Policies and Procedures are reviewed as changes in legislation occur and then re-published fully in September of the forthcoming academic year.

### **Review and Implementation**

- Policies and procedures are maintained and reviewed annually in July/August by the Management team.

- Policies and procedures are risk assessed and reviewed by Manager and Committee following any incident that is reportable under RIDDOR.
- Disciplinary action may be taken where individuals have disregarded policies and procedures.

### **Familiarisation and implementation**

- It is the responsibility of every member of staff, learner, and volunteer within the setting to adhere to and implement the policies and procedures at all times.
- An overview of policies and procedures is included in induction for individual members of staff, with specific emphasis given to safeguarding procedures.
- Members of staff must sign to say that they have read and understood the policies and procedures.
- Policies and Procedures are available electronically for all our stakeholders on our website [www.pinvinpreschool.org](http://www.pinvinpreschool.org). There is also a paper copy on site.
- Staff and trustees are encouraged to use policies when unsure of processes and to challenge policies if they need adapting through dialogue with the management team.
- Staff meetings and in-house training events are used as opportunities to focus on policies and procedures as required, and to discuss their implementation.
- Following an implementation of a Policy and Procedure such as a Health and Safety Procedure a review must be undertaken by the Manager to establish whether;
  - Did all members of staff follow the procedure?
  - Is further training required to ensure implementation?
  - Did the procedure fit the purpose, does it need adapting or changing?
- Committee meetings are used as opportunities to explain and discuss the implementation of the policies and procedures.

## Appendices

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### **Data Controller**

Means a person who (either alone or jointly in common with other persons) determines the purposes for which and the manner in which any personal data are, or are to be processed.

### **Data Processor**

In relation to personal data, means any person (other than an employee of the data controller) who processes the data on behalf of the data controller.

### **Processing**

In relation to information or data means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data.

### **Personal Data**

Any reference to identifiers such as name, identification numbers, IP address and location. Each person to which the personal data refers is known as the Data Subject.

### **Sensitive Personal Data**

As above but this is a Special Category of personal data which refers to very specific personal data which could be harmful if it were to get into the wrong hands, not be on hand when needed or was not kept up-to-date.

### **Biometric and Genetic Data**

Unique details about a person for example, finger prints.

### **Right to be Forgotten**

Individuals will all have the right to erasure of personal data.

### **Data Protection Officer**

A Data Protection Officer (DPO) is the person who is given formal responsibility for data protection compliance within an organisation. As schools are deemed by the ICO to be a public authority, they must appoint a DPO.

## **Data Sharing Agreement**

One of these must be in place for any organisation your school shares data with ie, suppliers.

## **Privacy Notice**

This is the school's notice to explain to everyone how you handle information that you have access to. Every school will need one on 25 May and it should be easily understood by parents and children.

## **Pseudonymisation**

This is a method by which personal data is processed so that it can no longer identify an individual subject without linking to additional data.

## **Encrypted Data**

Data is converted into code in order to prevent unauthorised access. It needs to be 'unlocked' to convert it back to make sense to the reader. Personal data must be encrypted.

## **Data Breach**

A data breach is a breach of security in which sensitive, protected or confidential data is copied, transmitted, viewed, stolen or used by an individual unauthorised to do so. For example, the loss of a USB stick, data being sent to the wrong address, the theft of a laptop or hacking.

## **ICO**

The Information Commissioner's Office is the UK's independent authority set up to uphold information rights in the public interest. They are sometimes referred to as the UK Supervisory Authority.

## **Data Protection Impact Assessment (DPIA)**

Sometimes referred to as part of a PIA (Privacy Impact Assessment). A DPIA describes the nature, scope, context and purpose of the processing. This document is written evidence that you have considered all the things that could potentially go wrong regarding aspects of personal data.

**Privacy by Design**

This is an approach where privacy and Data Protection compliance is built into systems holding information right from the start of the development process.

**Subject Access Request (SAR)**

As an organisation that holds personal data, you may well be asked to provide an individual with a report which details what, where, how and with whom you share their data.

RISK MANAGEMENT ASSESSMENT IN CONJUNCTION WITH GDPR COMPLIANCE POLICY									
Title (Activity/Job/ Premises)	Collecting Data	GDPR001	Likelihood	Risk/Severity					
				1 Insignificant	2 Minor	3 Moderate	4 Major	5 Catastrophic	
Location	Workplace	Zoe Corfield	1 Rare	1 Low	2 Low	3 Low	4 Moderate	5 Moderate	
Authorising Manager	Bobby Pearson	<i>Bobby Pearson</i>	2 Unlikely	2 Low	4 Moderate	6 Moderate	8 High	10 High	
Overall Rating	4	01/09/2020	3 Possible	3 Low	6 Moderate	9 High	12 High	16 Extreme	
			4 Likely	4 Moderate	8 High	12 High	16 Extreme	20 Extreme	
			5 Almost Certain	5 Moderate	10 High	16 Extreme	20 Extreme	26 Extreme	
Task/Equipment/ Materials/ Activity, etc.	Hazard	Who is at risk	Existing Controls currently used. (What are we doing now?)	Risk Evaluation			Additional control/precautionary measures required	By whom and when	
				Severity	Likeli- hood	Rating			
Child Registration form	Non-compliance GDPR: Collecting unnecessary data	All	Registration forms only require information needed to fulfil contract.	2	1	2	Review annually	Data Manager Start of academic year	
Internet scams and phishing	Fraudulent activity; risk to business and all data	All	Subscribed to IT company who maintain our systems weekly and report problems. Accounts are password protected. For software used for sensitive information we use multi-factor authentication	3	3	9	Staff to complete training on Phishing.	Start of academic year	
Job applicants	Non-compliance GDPR: Data breach	All	We use reputable employment agency for advertising. Data collected is stored in a lockable cabinet in the Safer Recruitment file. Data is	2	2	4	Ensure any email correspondence is deleted after retention period stated in data inventory. Request	Data Manager Start of academic year	

			destroyed as per our Data inventory retention periods.				written consent from applicant to keep data on file for future positions.	
Employee data	Non-compliance GDPR: Data breach	All	All Employee data is stored on the iCloud and a paper employee file is stored on site in a lockable cabinet.	2	2	4	Those who have access to files (Senior Management Team) to be reminded of professionalism and the need to treat data sensitively and confidentially.	All Management Team
Consent forms	Non-compliance GDPR: explicit consent	All	We have an opt in section on all consents opposed to an opt out.	2	2	4	Review annually	Data Manager

RISK MANAGEMENT ASSESSMENT IN CONJUNCTION WITH GDPR COMPLIANCE POLICY									
Title (Activity/Job/ Premises)	Processing Data	GDPR002	Likelihood	Risk/Severity					
				1 Insignificant	2 Minor	3 Moderate	4 Major	5 Catastrophic	
Location	Workplace	Zoe Corfield	1 Rare	1 Low	2 Low	3 Low	4 Moderate	5 Moderate	
Authorising Manager	Bobby Pearson	<i>Bobby Pearson</i>	2 Unlikely	2 Low	4 Moderate	6 Moderate	8 High	10 High	
Overall Rating	3	01/09/2020	3 Possible	3 Low	6 Moderate	9 High	12 High	16 Extreme	
			4 Likely	4 Moderate	8 High	12 High	16 Extreme	20 Extreme	
			5 Almost Certain	5 Moderate	10 High	16 Extreme	20 Extreme	26 Extreme	
Task/Equipment/ Materials/ Activity, etc.	Hazard	Who is at risk	Existing Controls currently used. (What are we doing now?)	Risk Evaluation			Additional control/precautionary measures required	By whom and when	
				Severity	Likeli- hood	Rating			
3 <sup>rd</sup> parties	Non-compliance GDPR	All	We only use reputable companies as 3 <sup>rd</sup> party processors; Tapestry, QuickBooks, Lloyds bank TSB, Local authority secure communications portal and Microsoft Outlook and cloud storage.	3	1	3	Update passwords for all 3 <sup>rd</sup> parties termly.	Data manager to oversee Termly	
Clear desk policy	Non-compliance GDPR: Data breach	All	All sensitive data is locked away at the end of the session.	3	1	3	Manager to ensure all staff aware of requirement and monitor	Data manager	
Emails	Non-compliance GDPR: Data breach	All	We blind copy group emails to parents.	2	1	2	Confidential emails to be checked by a senior management member	Senior Management Team	

RISK MANAGEMENT ASSESSMENT IN CONJUNCTION WITH GDPR COMPLIANCE POLICY									
Title (Activity/Job/ Premises)	Storing Data	GDPR003	Likelihood	Risk/Severity					
				1 Insignificant	2 Minor	3 Moderate	4 Major	5 Catastrophic	
Location	Workplace/home	Zoe Corfield	1 Rare	1 Low	2 Low	3 Low	4 Moderate	5 Moderate	
Authorising Manager	Bobby Pearson	<i>Bobby Pearson</i>	2 Unlikely	2 Low	4 Moderate	6 Moderate	8 High	10 High	
Overall Rating	3	01/09/2020	3 Possible	3 Low	6 Moderate	9 High	12 High	16 Extreme	
			4 Likely	4 Moderate	8 High	12 High	16 Extreme	20 Extreme	
			5 Almost Certain	5 Moderate	10 High	16 Extreme	20 Extreme	26 Extreme	
Task/Equipment/ Materials/ Activity, etc.	Hazard	Who is at risk	Existing Controls currently used. (What are we doing now?)	Risk Evaluation			Additional control/precautionary measures required	By whom and when	
				Severity	Likeli- hood	Rating			
Shared Premises	Non-compliance GDPR: Data breach, unauthorised access to data.	All	Lockable cabinets. Password protected computer systems. We have authorisation on who building is hired out to. Alarmed premises.	3	1	3	Report any concerns to memorial hall committee	Data Manager	
Back ups	Non-compliance GDPR: Loss of data	All	We use iCloud for all work which is backed up regularly. We have moved to cloud based applications to maximise internet safety	3	1	3	Continue to monitor	Data Manager	
Transporting data home	Non-compliance GDPR: Data breach	All	Safer working practices are followed when transporting laptops/lpads/preschool phone home. Ensure all password protected. Ensure out of view when being transported in	3	1	3	Working from home policy to be written	Data Manager by September	

			vehicles. Report missing items immediately.					
Working from home	Non-compliance GDPR: Data breach	All	Working from home document to ensure employees understand requirements	3	1	3	Working from home policy to be written	Data Manager by September
Holding data away from setting	Non-compliance GDPR: Data breach	All	Parents aware senior management team may have access to phone numbers, emails and child and family information in the employees' home and when away from the setting i.e. trips and outings. This is for emergency purposes and stated in our Policies and Procedures.	3	1	3	Working from home policy to be written	Data Manager by September
Freelance work	Non-compliance GDPR: Data breach		Freelancers who use own computer/laptop are required to store documentation in pre-school iCloud and delete off personal hardware. Restrictions will be in place as to what they can access on the iCloud.	3	2	6	Manager to monitor	Data Manager On-going

RISK MANAGEMENT ASSESSMENT IN CONJUNCTION WITH GDPR COMPLIANCE POLICY								
Title (Activity/Job/ Premises)	Sharing Data	GDPR004	Likelihood	Risk/Severity				
				1 Insignificant	2 Minor	3 Moderate	4 Major	5 Catastrophic
Location	Workplace	Zoe Corfield	1 Rare	1 Low	2 Low	3 Low	4 Moderate	5 Moderate
Authorising Manager	Bobby Pearson	<i>Bobby Pearson</i>	2 Unlikely	2 Low	4 Moderate	6 Moderate	8 High	10 High
Overall Rating	2	01/09/2020	3 Possible	3 Low	6 Moderate	9 High	12 High	16 Extreme
			4 Likely	4 Moderate	8 High	12 High	16 Extreme	20 Extreme
			5 Almost Certain	5 Moderate	10 High	16 Extreme	20 Extreme	26 Extreme
Task/Equipment/ Materials/ Activity, etc.	Hazard	Who is at risk	Existing Controls currently used. (What are we doing now?)	Risk Evaluation			Additional control/precautionary measures required	By whom and when
				Severity	Likeli- hood	Rating		
Multi-agency working	Non-compliance GDPR: Data breach	All	Parental consents are sought for SEND support. Parents are invited to attend SEND meetings and if do not attend, meeting is documented and shared with parent/carer. We only work with professional bodies who recognise and understand the importance of consent. Safeguarding consents are sought unless child at risk of significant harm and parental consent may aggravate this.	1	1	1	Continue to work with parents to ensure transparency	SENCO

Displays	Non-compliance GDPR: Data breach	All	Displays do not hold more than 2 identifiers. i.e. pegs may have picture but removable name tag. Staff pictures include name and relevant qualifications and job role.				Continue to monitor data displayed in the setting.	Data Manager
Parent requests	Non-compliance GDPR: Data breach	All	Parents who request child names for birthday parties etc. are given first names only.	1	1	1		
Tapestry: Group observations	Non-compliance GDPR: Data breach	All	Parents are asked to complete an additional consent form to allow their child to be in photos of group observations which will be published on Tapestry.	1	2	2	Monitor consents	Data Manager
Trips and outings	Non-compliance GDPR: Data breach	All	Data is kept securely with the manager and key persons. If stickers are used for children on outings, we do not use their name but the name of the setting. Children are not permitted to wear clothing or badges which clearly states their name.	2	2	4	Please refer to Safety and Suitability of Premises, Environment and Equipment Policy	All
Publicity	Non-compliance GDPR: Data breach	All	We always gain specific consent for any publications in the public domain i.e. newspaper articles.	2	1	2		

RISK MANAGEMENT ASSESSMENT IN CONJUNCTION WITH GDPR COMPLIANCE POLICY								
Title (Activity/Job/ Premises)	Deleting Data	GDPR005	Likelihood	Risk/Severity				
				1 Insignificant	2 Minor	3 Moderate	4 Major	5 Catastrophic
Location	Workplace	Zoe Corfield	1 Rare	1 Low	2 Low	3 Low	4 Moderate	5 Moderate
Authorising Manager	Bobby Pearson	<i>Bobby Pearson</i>	2 Unlikely	2 Low	4 Moderate	6 Moderate	8 High	10 High
Overall Rating	4	01/09/2020	3 Possible	3 Low	6 Moderate	9 High	12 High	16 Extreme
			4 Likely	4 Moderate	8 High	12 High	16 Extreme	20 Extreme
			5 Almost Certain	5 Moderate	10 High	16 Extreme	20 Extreme	26 Extreme
Task/Equipment/ Materials/ Activity, etc.	Hazard	Who is at risk	Existing Controls currently used. (What are we doing now?)	Risk Evaluation			Additional control/precautionary measures required	By whom and when
				Severity	Likeli- hood	Rating		
Archiving	Non-compliance GDPR: Data breach	All	Our Data inventory contains information on data retention in line with our statutory duties as an employer and registered early years provider. Our end of year procedures includes the scanning and archiving of data. Paper copies other than safeguarding and accident records are shredded. Scanned files are named, the date of deletion of paper file noted and password protected. Please see 'GDPR Compliance' within Information and Records Policy.	2	2	4	Checklist to be designed.	Data Manager

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Opening Times  
 Monday – Friday 8am – 6pm

**'Nurturing hearts and minds on a path of possibilities'**

### **Term Dates - Academic year 2020 - 2021**

<b>Autumn Term 2020</b>	
<b>Term begins</b>	Monday 7th September 2020
<b>Last day of term</b>	Friday 23rd October 2020
<b>Term begins</b>	Monday 2nd November 2020
<b>Last day of term</b>	Friday 18th December 2020

<b>Spring Term 2021</b>	
<b>Term begins</b>	Tuesday 5th January 2021
<b>Last day of term</b>	Friday 12th February 2021
<b>Term begins</b>	Monday 22nd February 2021
<b>Last day of term</b>	Thursday 1st April 2021

<b>Summer Term 2021</b>	
<b>Term begins</b>	Monday 19th April 2021
<b>Last day of term</b>	Friday 28th May 2021
<b>Term begins</b>	Monday 7th June 2021
<b>Last day of term</b>	Friday 16th July 2021

Please note funding can be used flexibly between the hours of 9 to 3  
 Monday to Friday.

Sessions between 8 – 9am and 3 – 6pm are charged at additional rates.